

SEEGERWEISS LLP
NEW YORK • NEW JERSEY • PHILADELPHIA • NEWTON, MA

David R. Buchanan
(973) 639-9100
dbuchanan@seegerweiss.com

February 23, 2024

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square
Newark, NJ 07102

**Re: *In re: Insulin Pricing Litigation, No. 2:23-md-03080-BRM-RLS*
MDL No. 3080**

Dear Judge Martinotti:

In accordance with CMO #3, the parties submit the following weekly status report through the undersigned counsel:

1. The parties have provided final versions of the proposed Confidentiality Order and have agreed on a schedule to provide a joint submission to the Court by March 5, 2024.
2. Earlier today, Defendants provided their revisions to the version of the ESI Protocol circulated by Plaintiffs on February 5, 2024. The parties are conferring regarding a schedule to promptly bring disputed issues before the Court.
3. Plaintiffs are awaiting a response to their proposals regarding a process for Rule 12 briefing. The parties anticipate having a proposal for the Court prior to the March case management conference.

We thank the Court for its continued attention to this matter.

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Respectfully submitted,

/s/ James E. Cecchi
James E. Cecchi
Liaison Counsel for
Third-Party Payer Class Track

/s/ David R. Buchanan
David R. Buchanan
Liaison Counsel for
Self-Funded Payer Track

/s/ Joanne Cicala
Joanne Cicala
Liaison Counsel for
The State Attorney General Track

/s/ John D. Tortorella
John D. Tortorella

cc: Honorable Rukhsanah L. Singh, U.S.M.J. (via ECF)
All Counsel of Record (via ECF)